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part 135

DEPT OF TRANSPORTATION DOCKETS

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There is a new aspect of terpsing from AFS-420 that must be addressed in takeoff requirements for part 135 and even 121. Terps (1.4.6) now specifies that obstacles in the ICA which would cause unrealistic climb gradients to an altitude of 200 feet or less be listed and published to the pilot TO BE SEEN OR ACCOUNTED FOR during the takeoff portion of the flight. This requirement may not be compatible with current Part 91 takeoff minimums (which specifies for the other parts). Therefore, the part 135 pilot should be regulated to either see and visually avoid these " in close obstacles" when present or (during an IMC departure) account for clearance over these obstacles mathematically using data from the POH, to include a buffer of 50 feet. The flight path computed would originate at the end of the POH computed takeoff roll and would provide an altitude of 50 feet over the published obstacles. The distance used to compute this required clearance would be the published "along track" distance, not the distance left or right of centerline. The pilot's best estimate of lift-off MSL altitude on the runway would suffice to compare to the MSL altitudes published for these obstacles. For those few aircraft which climb with steep deck angles, the pilot should be encouraged to do the calculations, if, in the pilots opinion, visual acquisition of these obstacles would be difficult. Also, the part 135 pilots who fly multi-engine aircraft should be encouraged (or regulated) to consider engine-out performance relative to these obstacles. This consideration would thus begin at the end of CFL (balanced field length). A provision for the 135 holder to coordinate with the POI for any special departure routes to avoid such obstacle departure problems would be a nice feature also. thanx old "Dog" Brenneman over n out